

IN THE UNITED STATES
DISTRICT COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS

BRIAN BUCHANAN
(Plaintiff)

-vs-
Dr. A. DUNIAQ
Director GORDINEZ
Dr. MINAZEEZ
Nurse TATE
SHERIFF TOM DART
(defendant)

08CV4685
JUDGE COAR
MAG. NOLAN

FILED
Aug 18, 2008
AUG 18 2008
AUG 18 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

MOTION FOR APPOINTMENT OF COUNSEL

Now come the Plaintiff BRIAN BUCHANAN, pursuant to 28 U.S.C. 1915 (e) (1) plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion, plaintiff states:

1. Plaintiff is incarcerated at the Cook County Jail and can not afford an attorney to represent him. He has requested leave to proceed Informa pauperis.

2. Plaintiff's incarceration will greatly limit his ability to litigate. The issues involved in this case are very complex and will require significant research and investigation into the medical field. The law library at the Cook County Jail in division 10 where the plaintiff is housed is inadequate in that it lacks the accountraments needed to prepare forms and or legal arguments should this case go to trial. The law library is not abreast in the federal court proceedings or in civil tort claims, therefore further limiting the plaintiff in his cause that is before this honorable court.

3. Atrial in this case will likely involve expert witnesses in the medical field and or conflicting testimony, counsel would better enable the plaintiff to present evidence, contact and perform depositions if neccesary as well as cross-examine any witnesses that the defendants may call. The plaintiff also only has an eighth grade education and the defendants would have the advantage of having litigators with at least a master's degree, which would extremely disadvantage the plaintiff. The defendants would also have a entire law firm at their disposal as well as para-legals to do research. Investigators to go out in the field, to which the plaintiff cannot do because of his present incarceration. All of these requisites the plaintiff does not have and prays this honorable court will grant his motion for appointment of counsel in the intrest of justice.

4. The plaintiff has made repeated efforts to try and obtain legal counsel. Plaintiff's attempts have all been in vain. Attached to this motion are letters that the plaintiff has written to various law firms and attorneys attempting to obtain legal representation.

Respectfully
Brian Buchanan